Responsible Wool Standard 2.0 Revision and Responsible Mohair Standard 1.0 IWG Call

Date: 9, January 2020

Topic(s):
Public Feedback Review

Attendees
From Textile Exchange: Hanna Denes, Callie Weldon
- Victoria Powers - TSGRA
- Ian Wicklen - Merrythought
- Peter Burston – The Biodiversity Consultancy
- Mackie Hobson – Mohair S.A.

Call Notes

News and Updates

Schedule:
The Public Feedback Period ran from **November 6th- January 8th**
The final drafts of the RWS 2.0 & RMS 1.0 will be sent out on **January 30th**.
Feedback on the final drafts will be collected until **February 13th**.
A revises final draft will be circulated by the 20th. The IWG members who have signed the charter will vote on this document
An electronic vote on the final drafts will take place **after February 20th**.
RWS Revision/RMS Development Process

Voting Process

If you’d like the opportunity to vote on the final draft, please sign the digital charter here:

https://form.jotform.com/193467003000141
General Feedback on the RWS 2.0 and RMS 1.0 Drafts

General feedback

- Social and Environmental Requirements: Take a tiered approach.
- Blending: Allow for blending with conventional wool OR clarify language around labelling.
- Group Certification: Membership of individually certified farms

Feedback on the standards approach will be considered in terms of the Terms of Reference for the standard(s) and the Theory of Change. Feedback regarding logo use, labelling, claims, assurance and the certification approach will be considered in relation to the overall Textile Exchange standards system.

Animal Welfare Feedback
Nutrition

- NC Levels
- Body Condition Scoring
- Deprivation periods (too long and too short)

Living Environment

- Defining 'long term' in relation to tethering
- Defining appropriate in relation to fencing
- Stocking rates, suggestion to move to nutrition section.
- Shelter construction
- Predator control (address in LM section)

Animal Management

- Inspection frequency: Recommend the inclusion of the risk based frequency into the standard rather than just the User Manual.
- Treatment: clearer definitions around animals that can be treated but can not move on their own (link to euthanasia decision tree)
- Grazing management and parasite control – suggested rewording
- Dipping: proposed additional requirements / guidance
- Pain relief (suitable & available)
- Castration methods (scrotum shortening)
- Allow tattooing for identification
- Allow horn branding
- Handling and shearing – cross reference needed
- Electroejaculation – allow for procedure with the conditions currently in the derogation policy
- Emergency euthanasia: Provide knife slaughter SOP in guidance
Handling and Transport

- Electric prodders: Clearer definition required in guidance. Request to allow for health and safety purposes
- Working dogs: Request to remove the requirement “A dog that habitually bites goats shall be muzzled while working goats / sheep”
- Livestock Guarding Animals
- Live export: need for clearer definition. Make requirement more active (signed statement?)
Land Management Feedback

Soil

Current standard
LM1.3 Soil erosion shall be monitored and managed.
LM1.3.1 Steps shall be taken to prevent or minimize soil erosion and to restore damaged areas.

Proposed change
LM 1.3 Soil erosion shall be monitored and managed.
LM 1.3.1 Steps shall be taken to prevent or minimize soil erosion and to restore damaged areas.
LM 1.3.2 The risk of sedimentation of water bodies with soil from fields should be assessed and managed (e.g. erosion control, avoidance of compaction, and riparian buffer strips).

Some of the most significant biodiversity impacts resulting from soil erosion occur when the sediment flows into receiving water bodies. The suggested wording of LM 1.3.2 places greater emphasis on this and the requirement for management to avoid these impacts. The suggested wording is adapted from the Unilever Sustainable Agriculture Code.

Biodiversity

Current standard
LM 2.1 Sensitive and high conservation value areas and wildlife species on the property shall be monitored and managed.

Proposed change
LM2.1 The Farm shall develop a Biodiversity Management Plan (BMP) that conserves and enhances biodiversity on and around the farm.

- As with the Health and Welfare Plan requirement, provide details on plan content, guidance and templates in the User Guide.

Suggested Biodiversity Management Plan (BMP) that clearly identifies areas important for biodiversity, including natural ecosystems, native vegetation and water bodies; any ecosystems known to support protected, threatened or endemic species; animal migratory corridors; and any areas of degraded land.
There should also be confirmation whether the farm is located either in a Protected Area or Key Biodiversity Area, and identification of the biodiversity values for which the site has been designated.

Recommendation to also have time-bound actions that will be implemented to manage, restore and enhance ecosystems on the farm. As well as time-bound actions that will be implemented to support populations of any protected, threatened or endemic species known to occur on the farm.

Also recommended to monitor the condition of the areas important for biodiversity.

**Grazing management**

Current standard

LM2.1.1 There shall be no grazing of sensitive areas in times of the year when it could have a negative impact on the ecosystem or on wildlife species.

Proposed change:

Combine under LM2.2.

**Grazing management and degradation**

Current standard

LM 2.2 Forage resources shall be monitored and managed.

LM2.2.1 Steps shall be taken to prevent or minimize degradation of forage resources, especially native range and perennial cover, and to restore degraded areas.

Proposed change

LM 2.2 Forage resources shall be monitored and grazing will be managed to protect, restore and enhance the biodiversity value of the farm.

LM 2.2.1 There shall be no grazing of areas important for biodiversity in times of the year when it could have a negative impact on natural ecosystems, native vegetation or on wildlife species.

LM 2.2.2 Livestock stocking rates and grazing management practices shall be adjusted to avoid negative impacts to areas important for biodiversity (e.g. from overgrazing, compaction, or erosion).

LM 2.2.3 Livestock stocking rates and grazing management practices shall encourage biodiversity and reflect the importance of native species within pastures.

LM 2.2.4 Any areas of degraded land shall be identified in the Biodiversity Management Plan, along with appropriate restoration measures.

Beyond the avoidance of degradation, the current wording does not clearly state what the desired outcome of the monitoring and management is. The wording is recommended to be amended in LM 2.2 to incorporate the objectives to protect, restore and enhance biodiversity values.

The terminology in relation to biodiversity values have been made consistent with LM 2.1.
LM 2.2 requires forage resources to be managed. Livestock stocking rate is probably the most significant factor in avoiding negative impacts (e.g. overgrazing) and therefore has been explicitly incorporated in the suggested wording.

### Invasive species

**Current standard**
LM 2.3 The farmer shall monitor and manage the infestation of unwanted exotic or invasive plants.

**Proposed change**
LM 2.3 The farmer shall monitor and manage invasive alien species of flora or fauna on the farm.
LM 2.3.1 The farmer shall not intentionally introduce any invasive alien species, and will implement measures to avoid accidental or unintended introduction (e.g. through the transportation of soil, plant materials and water etc.).
LM 2.3.2. Where invasive alien species are present on a farm, the farmer shall adopt measures to avoid their spread and eradicate them from natural ecosystems.

### Livestock wildlife conflicts

**Current standard**
LM 2.4 Farmer shall monitor the population of predators and wildlife (birds, mammals, or reptiles) on the farm and apply livestock husbandry practices that maintain biodiversity.

**Proposed change**
LM 2.4 Farms should implement measures to minimize livestock-wildlife conflicts.
LM 2.4.1. The population and behavior of predators should be monitored.
LM 2.4.2. The Farm should adopt proactive co-existence planning to deter predators.
LM 2.4.3 Wildlife corridors or routes used for migration should be maintained, if these are known to exist on the farm.

From the existing wording of LM 2.4 it’s not clear that this relates to live-stock-wildlife conflict, which can only be inferred from the related guidance.

The suggested wording aims to clarify the requirement and make it more specific to livestock-wildlife conflicts and incorporate some of the measures referred to in the resource links provided in the guidance (e.g. http://www.peopleandwildlife.org.uk). It places a specific requirement to be proactive to avoid problems in the first instance.
Livestock wildlife conflicts

Current standard
LM 2.5 Lethal control shall be minimized and done humanely.
LM2.5.1 Lethal control shall target the specific, individual animals(s) that is/are creating the conflict.
LM2.5.2 Lethal control of any animal shall result in instantaneous unconsciousness and death.
LM2.5.3 Use of poison for lethal control is prohibited.
LM2.6.4 The use of leg hold traps and snares is prohibited.

Proposed change
LM 2.5 Only if legally permitted, lethal control of predators shall be used as a measure of last resort, and carried out humanely.
LM2.5.1 Lethal control shall target the specific, individual animals(s) that is/are creating the conflict.
LM2.5.2 Lethal control of any animal shall result in instantaneous unconsciousness and death.
LM2.5.3 Use of poison, leg hold traps and snares are prohibited.

Land use change

Current standard
LM 2.7 Deforestation for conversion to agricultural land is prohibited.

Proposed change
LM 2.6 Deforestation and the conversion of natural ecosystems to agricultural land is prohibited.
• LM 2.6.2 Deforestation and the conversion of natural ecosystems to agricultural land shall not have occurred, 2016 onwards.

Hunting, fishing and gathering

Current standard
LM 2.5 Hunting, fishing or gathering of rare, threatened or endangered plant or animal species is prohibited.

Proposed change
LM 2.7 Hunting, fishing or gathering of protected, threatened or endemic plant or animal species is prohibited.

The existing wording is comprehensive, however terminology in relation to biodiversity values have been made consistent with LM 2.1 – in line with international definitions.
Protected Areas (PA) and Key Biodiversity Areas (KBAs) contribute significantly to the global persistence of biodiversity. It is important that Farmers are aware if they are operating in an PA or KBA and that they do not negatively impact these sites. Similar recognition is made in other standards such as the Rainforest Alliance, Round Table for Responsible Soy Responsible Soy Production Standard and non-agricultural standards such as the Aluminium Stewardship Initiative and the IFC Performance Standards. The IUCN has developed guidelines for businesses operating within Key Biodiversity Areas https://www.iucn.org/theme/business-and-biodiversity/our-work/business-approaches-and-tools/business-and-key-biodiversity-areas

Protected areas

Current standard
N/A

Proposed new requirement
LM 2.8 Production activities shall not degrade or significantly impact the biodiversity values for which a Protected Area or Key Biodiversity Area are designated.

Protecting wetlands and water courses

Current standard:
LM2.8 Water resources on the farm are managed to conserve water.
LM 2.8.1 Contamination of water sources must be prevented and special care shall be taken to limit or prevent harmful effluent.

Proposed change
LM 2.10 Aquatic ecosystems and water bodies shall be conserved and enhanced.
LM 2.10.1 River banks must be managed to keep erosion and soil run-off to a minimum.
LM 2.10.2 Riparian ecosystems should be protected and restored, as part of the Biodiversity Management Plan.
LM 2.10.3 Buffer zones should be maintained adjacent to wetlands and watercourses, within which fertilizer, manure and pesticide applications should be restricted.
LM 2.10.4 Natural wetlands shall not be drained.
Fertilizer use

Current standard
LM3.3 Fertilizers applied shall be appropriate and as specific to the situation as possible with minimal side effects.
LM3.2.1 Manures and fertilizers that can have a negative effect on soil microbial life and/or which contain heavy metals should not be used.

Proposed change
LM 3.3 Fertilizers applied shall be appropriate and as specific to the situation as possible with minimal side effects.
LM 3.2.1 Manures and fertilizers that can have a negative effect on soil microbial life and/or which contain heavy metals should not be used.
LM 3.2.2 Fertilizers and manures must only be applied to the intended crop area, specifically avoiding water bodies, riparian zones and natural ecosystems.

The application of fertilizers to natural ecosystems can have permanent impacts, leading to the loss of its biodiversity value and should be treated as a form of conversion. Eutrophication of waterbodies is a leading cause of damage to aquatic ecosystems, and agriculture is one of the main sources of excess nutrients. It is recommended that a specific standard is included under LM3.3 to address this risk. The suggested wording of LM 3.2.2 is adapted from the Unilever Sustainable Agriculture Code.

Pesticides

Current standard
LM4.4 Pesticides applied shall be appropriate and as specific to the situation as possible with minimal side effects

Proposed change
LM 4.4 Pesticides applied shall be appropriate and as specific to the situation as possible with minimal side effects
LM 4.4.1 Producers must apply pesticides in appropriate weather conditions, according to the directions on the label, and/or manufacturers’ directions, with appropriate and well-maintained equipment.
LM 4.4.2 Pesticides shall only be applied to the intended crop area, specifically avoiding water bodies, riparian zones and natural ecosystems.

Social Welfare Feedback
Hiring practices and forced labour

Overall feedback:
Guidance and templates are needed.
Threshold for applicability of these requirements is needed. Aligning with other schemes on threshold.
SW1.4.1 The farm shall orient employees on farm hiring policies and procedures, workers’ rights related to these, and communication mechanisms, including for raising concerns/grievances.
Make SW1.4.1 a recommendation or incorporate in guidance material

Child labour

- No feedback

Working conditions and conduct

Remove SW3.4 (currently recommendation) as not suitable in many contexts.

SW3.4 Workers should not work more than 9 regular hours per day, and 54 regular hours per week, and breaks are provided appropriately.

SW3.4.1 Workers should be provided breaks in accordance with national law, or at least one break of thirty minutes after six consecutive hours of work (whichever is greater). Extra breaks are provided to accommodate religious or cultural observances (though these need not be paid, beyond the regular cumulative break time)

SW3.4.2 Farmers should provide minimum leave as prescribed by labour legislation or where no legal requirement, a minimum of 1 day for every 6 consecutive days worked.

Freedom of association and collective bargaining

- No feedback
Wages and benefits

SW5.1 Workers shall receive wages that comply with local legal minimum wages or collectively bargained wages, whichever is higher.
SW5.1.1 Overtime should be reimbursed at a premium rate in accordance with all local applicable laws or as established by a collective bargaining agreement, whichever is greater.
SW5.1.2 Farmers shall not use consecutive short-term contracts and/or false apprenticeship or other schemes to avoid meeting its obligations to personnel under applicable labour laws and regulations.
SW5.1.3 Farmers shall pay all wages in legal tender and provide benefits due in a manner convenient to workers, without delay or substitutions e.g. vouchers, coupons, or promissory notes.

Feedback: Currently make sub requirements recommendations. (change 6.1.2. and 5.1.3 from shall to should)

SW5.2 Workers shall receive work contracts that are transparent, written in an understandable language and provide for regular and expected compensation.
SW5.2.1 Wages and overtime payment shall be documented both on the pay slips/pay registers and in pay contracts available to all workers.

Feedback: Move 5.2 to section 1 and make 5.2.1. a subrequirement of 5.1

Communities

• No feedback

Health and Safety

SW7.2 Access to clean and potable water shall be provided.
Feedback: Specify at the main farm site

SW7.3 Facilities for proper hygiene and comfort, including hand-washing facilities and toilets, and a place to store food shall be available.
Feedback: Specify at the main farm site

Next Steps
Next steps

Preparation of final draft

International Working Group
• Sign charters if you would like to vote
• Balanced representation for vote

Standard Documents
• User guide
• Certification Procedures
• Logo use and claims guide
• User Guide
 (+ implementation support tools: case studies, webinars, etc)

Next Call

RWS/RMS Call #11
February 6th, 2020 – 7:00 AM Mountain Time (US and Canada)

Register Here: https://zoom.us/meeting/register/u5EodO-ppjgrUS1l6OgcWzSv0ZL-JP9ggw

Follow up

Sign the digital charter to become a voting member
https://form.jotform.com/193467003000141